

James M. Roberts
Counsel

212-344-5400
jroberts@schlamstone.com

Schlam Stone
& Dolan LLP

26 Broadway, New York, NY 10004
Main: 212 344-5400 Fax: 212 344-7677
schlamstone.com

October 10, 2024

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Ryan Salame*, 22 Cr. 673 (LAK)
Request to Postpone Self-Surrender Date

Dear Judge Kaplan:

On behalf of Ryan Salame, we respectfully submit this letter in response to the Government's opposition to Mr. Salame's request that the Court continue the date for Mr. Salame to voluntarily surrender to the Bureau of Prisons ("BOP") to begin serving his sentence from Friday, October 11, 2024, to Friday, December 7, 2024, so that he may receive continuing medical treatment deemed necessary by his treating physician to recover from the injuries sustained on or about June 29, 2024 (ECF No. 519).

First, the Government's opinions as to Mr. Salame's medical condition based on its observations of Mr. Salame should not supersede the professional medical opinion of his treating physician. Second, the Government suggests that rejecting Mr. Salame's request amounts to merely not proceeding according to Mr. Salame's treating physician's "preferred timeline." However, the Court sentenced Mr. Salame to an aggregate term of 90 months' imprisonment. Third, while the Government points to non-medical factors as justification for rejecting Mr. Salame's request, Mr. Salame's physician's correspondence speaks for itself.

For the foregoing reasons, Mr. Salame respectfully requests that the Court grant Mr. Salame a continuance of his self-surrender date until Friday, December 7, 2024.

Hon. Lewis Kaplan
October 10, 2024
Page 2 of 2 Pages

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. M. Roberts", with a long horizontal stroke extending to the right.

James M. Roberts

cc: Douglas E. Grover, Esq.